09-50026-mg Doc 14292-2 Filed 05/02/18 Entered 05/02/18 23:58:04 Exhibit A - Direct Mail Notice Pg 1 of 3

EXHIBIT A

If you owned or leased a GM vehicle prior to July 10, 2009 your rights may be affected by a proposed bankruptcy court settlement

A proposed settlement (the "Settlement") involving claims of owners and lessees of certain General Motors Corporation ("Old GM") vehicles has been agreed upon in the bankruptcy case of Old GM. The claims that are impacted by the Settlement are that consumers overpaid when they bought cars before July 10, 2009 that had undisclosed defects relating to the cars' ignition switches, side airbags, or power steering. These cars were the subject of the following recalls: 14V-047, 14V-355, 14V-394, 14V-400, 14V-118 and 14V-153 (the "EL Recalls"). The Settlement also impacts those consumers that claim to have suffered personal injury or wrongful death as a result of accidents that occurred before July 10, 2009 involving Old GM vehicles that were later subject to Recall Nos. 14V-047, 14V-355, 14V-394, 14V-400, or 14V-540 (the "PIWD Recalls"). If approved, the Settlement will affect your right to bring your own lawsuit asserting injury, death, or economic loss claims against the Old GM bankruptcy estate. The purpose of this notice is to inform you of the proposed Settlement, and your legal rights.

Who Will be Affected by the Proposed Settlement? The Settlement includes all persons in the United States who, prior to July 10, 2009, (i) bought or leased a vehicle manufactured by Old GM that was included in one of the EL Recalls, which involved Chevrolet, Pontiac, Saturn, Buick, Cadillac, Oldsmobile and GMC model vehicles; and/or (ii) suffered personal injury or wrongful death in an accident involving the specific Old GM vehicles that were subject to the PIWD Recalls. A person who falls into either of these two categories is called an "Affected Person." You can go to the Settlement Website, www.XXXXXXXXXXXXXXXXX.com to confirm if your vehicle was subject to the Recalls, which would make you an Affected Person.

What are the Settlement Terms? If the Settlement is approved, each Affected Person will be deemed to have forever waived and released any and all claims they might otherwise have against the Old GM estate, the Motors Liquidation Company General Unsecured Creditors Trust (the "GUC Trust"), the trust administrator of the GUC Trust, the past and present assets of the GUC Trust, the Motors Liquidation Company Avoidance Action Trust and/or the holders of beneficial units in the GUC Trust (collectively, the "Released Parties"). General Motors LLC ("New GM") is **not** a Released Party.

This means that: (a) if you have an existing lawsuit against Old GM or the Released Parties that includes the same claims that this Settlement resolves, your lawsuit will end; (b) you release and forfeit any right to prior or future distributions of GUC Trust assets or Avoidance Action Trust assets, other than those distributions provided for in the Settlement; and (c) you cannot bring a new lawsuit against Old GM or the Released Parties with respect to these issues in any forum. In exchange, the GUC Trust will pay \$15 million into the Settlement Fund and seek the entry of an order estimating certain Affected Persons' claims (the "Claims Estimate Order"). If these claims are estimated in an amount of \$10 billion or more, New GM will be required to issue 30 million shares of New GM common stock to the Settlement Fund, which will be used to pay Affected Persons based on an allocation and eligibility criteria that will be determined at a later date. If the Claims Estimate Order is entered in an amount between \$3 billion and \$10 billion, New GM will be required to issue shares of New GM common stock in an amount pursuant to a formula but less than 30 million. The current value of 30 million shares of New GM common stock is approximately \$1.1 billion. Unless applicable law says otherwise, the Settlement or any payment you may receive under it does not affect any claim you may have against New GM.

THERE IS NO GUARANTEE THAT THE CLAIMS ESTIMATE ORDER WILL REQUIRE NEW GM TO ISSUE ANY SHARES, LET ALONE THE MAXIMUM NUMBER OF SHARES, OF NEW GM COMMON STOCK. IF THE SETTLEMENT IS APPROVED, HOWEVER, THE RELEASE AND WAIVER WILL REMAIN EFFECTIVE REGARDLESS OF WHETHER ANY SHARES OF NEW GM COMMON STOCK ARE ULTIMATELY MADE AVAILABLE TO AFFECTED PERSONS.

For details about the Settlement, the money that may be available to Affected Persons, your eligibility, how the money will be divided, and the waiver and release of claims, you should visit www.XXXXXXXXXXXXX.com and review the Long Form Notice and the Settlement Agreement.

How Can I Get a Payment? Being defined as an Affected Person does not assure you will receive a distribution from the Settlement Fund. Overall allocation between economic loss and personal injury plaintiffs will be negotiated by counsel to the Signatory Plaintiffs and approved by the appropriate court. Eligibility and criteria for payment will be approved by the Court. The details will be posted on the Settlement Website and you will be given an opportunity to object.

Your Other Options. You can object to the proposed Settlement. The Long Form Notice available on
the Settlement Website listed below explains how to object. The Bankruptcy Court will hold a hearing on
, 2018 at[a][p]m to consider whether to approve the Settlement. You may appear at
the hearing, either yourself or through an attorney hired by you, but you do not have to. Please note that
the date and time of the hearing is subject to change without further notice other than an announcement on
the Settlement Website. For more information, call or visit the Settlement Website below. IF YOU DO
NOT OBJECT TO THE SETTLEMENT AND THE SETTLEMENT IS APPROVED, YOU WILL
BE BOUND BY THE RELEASE AND WAIVER.

1-8xx-xxx-xxxx	www.	.com

[On the back of the postcard will be the plaintiff's name and address, and court logo:]

<u>Important Court-Approved Legal Notice from the United States Bankruptcy Court for the Southern</u>
District of New York



Plaintiff John Doe 123 45th Street Anytown, USA.

General Motors Bankruptcy Settlement Information